

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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SPECIAL SERVICES FEES AND CLASSIFICATIONS, 1996)

POSTAL RATE COMMISSION
DOCKETED
SECRETARY

NASHUA PHOTO, INC., MYSTIC COLOR LAB, AND SEATTLE FILMWORKS INC.
THIRD FOLLOW-UP INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO UNITED STATES POSTAL SERVICE (NMS/USPS-77-82)
(September 17, 1996)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice,
Nashua Photo Inc., Mystic Color Lab, and Seattle FilmWorks, Inc.¹ hereby submit the
following follow-up interrogatories and document production requests. If necessary, please
redirect interrogatories and/or requests to a more appropriate Postal Service witness.

Respectfully submitted,

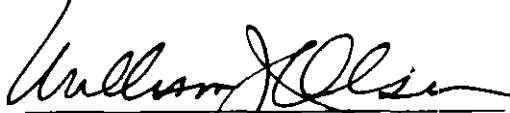


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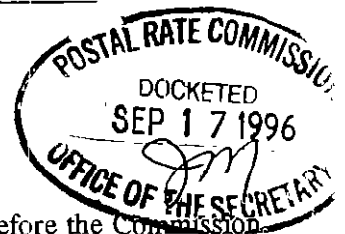
Counsel for Nashua Photo Inc., Mystic Color Lab,
and Seattle FilmWorks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all participants of
record in this proceeding in accordance with Section 12 of the Rules of Practice.


William J. Olson

September 17, 1996



¹ Seattle's motion for leave to intervene out of time is pending before the Commission.

NMS/USPS-77.

For Base Year 1995, what is the average annual salary of a clerk/mailhandler:

- a. without fringe benefits?
- b. including all fringe benefits?

NMS/USPS-78.

For Test Year 1996, what is the average salary of a clerk/mailhandler that is assumed in exhibit USPS-T-5H:

- a. without fringe benefits?
- b. including all fringe benefits?

To the extent that Test Year assumptions for various components of the pay package (*e.g.*, overtime, holiday leave, repriced annual leave, etc.) differ from the actual outcome in 1995, please indicate those assumptions and how they differ from actual experience in Base Year 1995.

NMS/USPS-79.

- a. For a clerk/mailhandler, what was the average number of productive hours worked in Base Year 1995?
- b. For a clerk/mailhandler, (i) what was the average productive hourly wage rate in Base Year 1995, and (ii) what is the projected average productive hourly wage rate in Test Year 1996?

NMS/USPS-80.

For Base Year 1995, what is the appropriate piggyback factor to apply to the salary of a mail clerk assigned full-time to a plant-load facility?

NMS/USPS-81.

Please provide a responsive answer to NM/USPS-1(c)(ii). That is, please indicate specifically where within the JCRA revenues derived from the fee for merchandise return services are reported. For base year 1995, please indicate whether such fees were part of third-class regular rate mail, fourth-class parcel post, fourth-class special rate, or fourth-class bound printed matter.

NMS/USPS-82.

The response to NM/USPS-3 states:

For instance, the 130,358 for return receipts and the 7,472 for restricted delivery are included in the special service that caused their existence; for example, the return receipts associated with certified mail are in the certified revenue.

Please refer to the attachment to NM/USPS-1 and note that the \$130,358(000) is for **registry**, not **return receipts**. Please clarify the response. Was the intent to say that revenues from **registry** are included elsewhere, or was the intent to say that the \$186,938(000) of revenues from **return receipts** are included in the certified mail revenue of \$414,999(000)?